

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA  
CLARKSBURG DIVISION

STEVEN BROWN, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 1:22-cv-00080
	)	
THE BUREAU OF ALCOHOL, TOBACCO,	)	
FIREARMS, AND EXPLOSIVES, et al.,	)	
	)	
Defendants.	)	
	)	

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**DEFENDANTS' NOTICE OF SUPPLEMENTAL AUTHORITY**

Defendants the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF); Steven Dettelbach, in his official capacity as the Director of ATF; and Merrick Garland, in his official capacity as Attorney General of the United States, respectfully request that the Court take notice of the attached Opinion issued in *National Rifle Association v. Bondi*, No. 21-12314 (11th Cir. Mar. 9, 2023). Plaintiffs in this case raised a Second Amendment challenge to Florida's law prohibiting individuals under the age of 21 from purchasing, but not possessing, firearms. *See* Opinion, ECF No. 65-1, at 4. The Eleventh Circuit canvassed the historical evidence on age-based restrictions related to firearms and concluded that Florida's law was "consistent with our Nation's historical tradition of firearm regulation." *Id.* at 5.

Dated: March 9, 2023

Respectfully submitted,

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By: /s/ Maximillian F. Nogay

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